

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
)
)
v.) No. 09-CR-10382-DPW
)
)
ALBERT GONZALEZ,)
)
Defendant.)
)
)

MOTION TO FILE SENTENCING MEMORANDUM
WHICH IS 27 PAGES IN LENGTH

Now comes the defendant and respectfully requests that this Honorable Court permit him to file a Sentencing Memorandum which is 27 pages in length.

As reason therefor, defendant states:

1. This is a very serious case in which defendant seeks to convince the Court that a sentence at the low end of the sentencing range agreed upon by the defendant and the government is the sentence which is sufficient, but not greater than necessary, to serve the purposes of sentencing. The memorandum addresses both the loss calculation contained in the PSR and the 18 U.S.C. §3553(a) sentencing factors, as well as several other important matters. It also responds to the government's Sentencing Memorandum.

2. The case is both legally and factually complex, and the important contentions which defendant submits to the Court cannot be adequately presented within the 20-page limit imposed by the local rules.

Respectfully Submitted,
By His Attorney,

/s/ Martin G. Weinberg
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DATED: March 22, 2010

CERTIFICATE OF SERVICE

I, Martin G. Weinberg, hereby certify that on this 22nd day of March, 2010, a copy of the foregoing document has been served via the Electronic Court Filing system on all registered participants, including Stephen P. Heymann, AUSA.

/s/ Martin G. Weinberg
Martin G. Weinberg